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**Subject: Conflict of Interest**

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Effective Date: October 1, 2005

Revised:

**Policy:** Individuals, including WIC staff and state employees, involved in determining WIC eligibility, certification or recertification, or processing WIC checks, shall not be related (spouses, parent-child, siblings, aunt/uncle-nephew/niece, grandparent-grandchild) to the applicant or client and shall not have a financial interest in an authorized WIC retail store. These individuals who are receiving WIC benefits may not certify or issue food instruments to themselves.

**Reference: CFR §246.12(h)(3)(xix)**

**Procedure:**

1. Clinics shall record all WIC employees/staff in the agency or clinic service area who are clients. [See Forms section, Declaration of Conflict of Interest Log Sheet.]
2. Clinics shall record all WIC employees/staff in the agency or clinic service area who are related to clients, (spouses, parent-child, siblings, aunt/uncle-nephew/niece, grandparent-grandchild).
3. Clinics shall document all WIC employees or WIC employees' family members who have been identified as a WIC Retail store's owner or a member of senior management.
4. Unless under extenuating circumstances approved by the State WIC Office, WIC employees or staff shall not be a proxy for a client.
5. If an employee is a client or has a relative who is a client:
  - a. another WIC staff member shall certify the individual and issue checks; and
  - b. if another WIC staff member or health agency staff member is not available, the Local WIC Agency shall contact the State WIC Office to request an exemption under extenuating circumstances.
6. A WIC employee or staff shall not direct or influence clients to use a particular retailer to redeem WIC checks.